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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**BRANDON SALUS, ALAN FELIX
IPANAQUE CORDOVA, and BRANDON
RUCKDASHEL on behalf of themselves and
others similarly situated,**

INDEX NO: 07cv03142-GBD-DCF

NOTICE OF MOTION

Plaintiffs,

v.

**TSE GROUP LLC d/b/a B.B. KING BLUES
CLUB AND GRILL and TSION
BENSUSAN**

Defendants.

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**NOTICE OF MOTION BY PLAINTIFFS FOR CERTIFICATION OF
A SETTLEMENT CLASS AND FINAL APPROVAL OF
A CLASS ACTION SETTLEMENT**

Please take notice that, upon the annexed memorandum of law and attachments thereto, Plaintiffs will move this court, before the Honorable George B. Daniels, pursuant to Rule 23 of the Federal Rules of Civil Procedure, on April 3, 2008 at 2:00 p.m., for an order (1) granting final approval of a class action settlement, (2) certifying the settlement

class, (3) awarding Class Counsel's attorneys' fees and costs, and (4) granting such other, further, or different relief as the Court deems just and proper.

Dated: March 31, 2008
New York, New York

JOSEPH & HERZFELD LLP

/s/ D. Maimon Kirschenbaum
By: D. Maimon Kirschenbaum (DK-2338)
Charles E. Joseph (CJ-9442)

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